

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**[AMENDED PROPOSED] ORDER GRANTING TRUSTEE’S MOTION TO STRIKE
THE NOTICES OF WITHDRAWAL OF CLAIM AND NOTICES OF WITHDRAWAL
OF OBJECTION TO DETERMINATION OF CLAIM FILED BY CHAITMAN LLP
AND DENTONS US LLP**

Upon consideration of the motion (the “Motion”) [Docket No. __] and the supplement (the “Supplement”) [Docket No. __], by Irving H. Picard, trustee (“Trustee”) for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and the chapter 7 estate of Bernard L. Madoff (“Madoff”) (collectively, “Debtor”), in the above-captioned SIPA liquidation proceeding seeking the entry of an order striking the notices of withdrawal of claim and notices of withdrawal of objection to determination of claim filed by Chaitman LLP and Dentons US LLP (collectively, the “Withdrawals”); and due and proper notice of the Motion having been given and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the

Motion as set forth herein is in the best interests of the Debtor, its estate, creditors, and all parties in interest; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Motion and Supplement are granted to the extent provided herein; and it is further

ORDERED that the Withdrawals identified on the list annexed hereto as Exhibit A are stricken from the Court's docket and have no legal effect; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2018
New York, New York

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Exhibit A
Withdrawals

	Adv. Pro. No.	Claimants	Withdrawal Docket No.	Counsel
1.	10-04332	Barry Weisfeld	17625	Dentons US LLP
2.	10-04390	Michael Mann and Meryl Mann	17630	Dentons US LLP
3.	10-04390	BAM LP	17623	Dentons US LLP
4.	10-04401	The Rose Gindel Revocable Trust Agreement	17634	Dentons US LLP
5.	10-04415	Barbara J. Berdon	17624	Dentons US LLP
6.	10-04486	Norma Shapiro Revocable Declaration of Trust	17633	Dentons US LLP
7.	10-04486	Trust U/W/O Philip L. Shapiro	17638	Dentons US LLP
8.	10-04486	Norma Shapiro (IRA)	17632	Dentons US LLP
9.	10-04861	Harold J. Hein Individual Retirement Account	17626	Dentons US LLP
10.	10-04882	Laura E. Guggenheimer Cole	17628	Dentons US LLP
11.	10-04921	Stanley T. Miller IRA	17635	Dentons US LLP
12.	10-04925	The Alvin Gindel Revocable Trust Agreement	17622	Dentons US LLP
13.	10-05209	Lapin Children LLC	17627	Dentons US LLP
14.	10-05236	The Toby T. Hobish IRA	17637	Dentons US LLP
15.	10-05236	LI RAM L.P.	17629	Dentons US LLP
16.	10-05384	The Neil Reger Profit Sharing Keogh	17631	Dentons US LLP
17.	10-04377	Carol Nelson Stanley Nelson	17682, 17733 ¹	Chaitman LLP
18.	10-04658	Carol Nelson	17683, 17734 ²	Chaitman LLP

¹ Carol Nelson and Stanley Nelson filed an identical Notice of Withdrawal of SIPC Claim in Adv. Pro. No. 10-04377 (SMB), ECF No. 95.

² Carol Nelson filed an identical Notice of Withdrawal of SIPC Claim in Adv. Pro. No. 10-04658 (SMB), ECF No. 101.

19.	10-04898	Helene Saren-Lawrence	17684, 17732 ³	Chaitman LLP
20.	10-04292	Robert Roman	17852	Chaitman LLP
21.	10-04302	Joan Roman	17851	Chaitman LLP
22.	10-04321	Lewis Barbanel as the Personal Representative of the Estate of Herbert Barbanel and the Estate of Alice Barbanel	17827	Chaitman LLP
23.	10-04327	Roberta Schwartz Trust U/A/D 2/11/08	17856	Chaitman LLP
24.	10-04367	Benjamin T. Heller	17840	Chaitman LLP
25.	10-04397	Fern C. Palmer Revocable Trust Dtd 12/31/91, as amended	17848, 17849	Chaitman LLP
26.	10-04469	Carl L. Kamenstein, Sloan G. Kamenstein, Tracy D. Kamenstein, and David R. Kamenstein	17842	Chaitman LLP
27.	10-04503	Judd Robbins	17850	Chaitman LLP
28.	10-04562	Robert F. Ferber	17835	Chaitman LLP
29.	10-04610	Whitman Partnership	17859	Chaitman LLP
30.	10-04621	Donald A. Benjamin	17828	Chaitman LLP
31.	10-04644	Russell Laslow Dusek	17832	Chaitman LLP
32.	10-04740	Robert Hirsch and Lee Hirsch	17841	Chaitman LLP
33.	10-04752	Judith Gattegno in her capacity as a member of the Kuntzman Family LLC	17845	Chaitman LLP
34.	10-04753	Carla Ginsburg , M.D.	17837	Chaitman LLP
35.	10-04806	Kenneth M. Kohl and Myrna L. Kohl	17843	Chaitman LLP
36.	10-04809	Edyne Gordon, in her capacity as the Executrix of the Estate of Allen Gordon	17838	Chaitman LLP

³ Helene Saren-Lawrence filed an identical Notice of Withdrawal of SIPC Claim in Adv. Pro. No. 10-04898 (SMB), ECF No. 141.

37.	10-04818	Toby Harwood	17839	Chaitman LLP
38.	10-04823	Frank DiFazio and Carol DiFazio	17831	Chaitman LLP
39.	10-04826	Diane Homers and Bruce Palmer, Personal Representative of the Estate of Boyer Palmer	17847	Chaitman LLP
40.	10-04837	Leslie Ehrlich and Stephen Ehrlich	17834	Chaitman LLP
41.	10-04956	Athena Arvan, as the Personal Representative of the Estate of Denis M. Castelli	17830	Chaitman LLP
42.	10-04995	Evelyn Berezin Wilenitz, Trust U/ART Fourth O/W/O Israel Wilenitz, Evelyn Berezin and Sara Seims, Trustee	17829	Chaitman LLP
43.	10-05026	Walter Freshman Revocable Trust and Frieda Freshman Revocable Trust Dated 12/31/92	17836	Chaitman LLP
44.	10-05104	Maurice Sandler, individually as grantor and beneficiary of and in his capacity as Trustee of The Gloria Albert Sandler and Maurice Sandler Revocable Trust	17854	Chaitman LLP
45.	10-05124	Theresa R. Ryan, individually and in her capacity as trustee of the Lawrence J. Ryan & Theresa R. Ryan Revocable Living Trust & the Lawrence J. Ryan By-Past Trust Under Declaration of Trust Dated 11/20/1991	17853	Chaitman LLP
46.	10-05130	Barbara Kotlikoff Harman	17844	Chaitman LLP
47.	10-05151	The Palmer Family Trust	17863	Chaitman LLP
48.	10-05157	Steven P. Norton, Martin R. Harnick, The Harnick Brothers Partnership	17860	Chaitman LLP
49.	10-05312	Doron Tavlin Trust U/A/ 2/4/91	17857	Chaitman LLP
50.	10-05377	Richard G. Eaton	17833	Chaitman LLP
51.	10-05420	Gunther K. Unflat and Margaret Unflat	17858	Chaitman LLP
52.	10-05435	Keith Schafer and Jeffrey Schaffer, Jeffrey Schaffer and Donna Schaffer, Keith Schafffer	17855	Chaitman LLP